

United States District Court  
Northern District of California

1 JAMES McMANIS (40958)  
2 TYLER ATKINSON (257997)  
3 HILARY WEDDELL (293276)  
4 McMANIS FAULKNER  
5 50 W. San Fernando Street, 10th Floor  
6 San Jose, CA 95113  
7 Telephone: (408) 279-8700  
8 Facsimile: (408) 279-3244  
9 tatkinson@mcmanslaw.com

10 Attorneys for Plaintiff,  
11 SHIOW-HUEY CHANG

12 ORRY P. KORB, County Counsel (S.B. #114399)  
13 DAVID M. ROLLO, Deputy County Counsel (S.B. #111998)  
14 ARYN PAIGE HARRIS, Deputy County Counsel (S.B. #208590)  
15 OFFICE OF THE COUNTY COUNSEL  
16 70 West Hedding Street, East Wing, Ninth Floor  
17 San Jose, California 95110-1770  
18 Telephone: (408) 299-5900  
19 Facsimile: (408) 292-7240

20 Attorneys for Defendants,  
21 COUNTY OF SANTA CLARA, SANTA CLARA  
22 COUNTY SHERIFF'S OFFICE, DEPUTY DANIEL  
23 J. FOREST, and DEPUTY STRICKLAND

24  
25  
26  
27  
28  
UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

18 SHIOW-HUEY CHANG,

Case No. 15-CV-02502 RMW

19 Plaintiff,

20 vs.

21 COUNTY OF SANTA CLARA, a public  
22 entity, SANTA CLARA COUNTY  
23 SHERIFF'S OFFICE, a department of the  
24 County of Santa Clara, DEPUTY DANIEL  
J. FOREST, an individual, DEPUTY  
STRICKLAND, an individual, and DOES 1-  
50, inclusive,

[PROPOSED] ORDER AFTER INITIAL  
CASE MANAGEMENT CONFERENCE

25 Defendants.  
26  
27  
28

1 An Initial Case Management Conference was held before the Honorable Ronald Whyte on  
2 September 11, 2015, for the above entitled case. Tyler Atkinson and Hilary Weddell of McManis  
3 Faulkner appeared for plaintiff, Shiow-Huey Chang. David Rollo appeared on behalf of defendants.  
4 The following determinations were made:

5 Discovery

6 Subject to further order, discovery shall be limited to the following:

7

- 8 • Depositions: no more than ten (10) per side.
- 9 • Interrogatories: no more than twenty-five (25) per side.
- 10 • Requests for Production of Documents: No limit but must be narrowly tailored.
- 11 • Request for Admissions: no more than ten (10) per side.

12 Schedule

13

- 14 • Last day to amend pleadings: 11/6/2015.
- 15 • Fact discovery cut-off: 11/25/2015.
- 16 • Deadline for opening expert reports: 2/25/2016.
- 17 • Deadline for rebuttal expert reports: 3/24/2016.
- 18 • Expert discovery cut-off: 4/29/2016.
- 19 • Last day to hear dispositive motions: 4/29/2016 at 9:30 AM.
- 20 • Pretrial Conference set for 5/26/2016 at 2:00 PM.
- 21 • Jury Trial set for 7/11/2016 at 1:30 PM.

22     ///

23     ///

24     ///

25     ///

26     ///

27     ///

28     ///

1        Alternative Dispute Resolution

2        The Case is referred to Magistrate Judge Nathanael M. Cousins for settlement. The  
3        settlement conference is to be completed within 90 days. If parties believe that there is no  
4        opportunity for case to be resolved before a settlement judge, the parties may request leave of court  
5        to appoint a mediator.

6

7        APPROVED as to Form:

8        DATED: September 11, 2015

McMANIS FAULKNER

9

10        \_\_\_\_\_/s/  
11        JAMES McMANIS  
12        TYLER ATKINSON  
13        HILARY WEDDELL

14

15        Attorneys for Plaintiff

16        DATED: September 11, 2015

17

18        \_\_\_\_\_/s/  
19        DAVID ROLLO  
20        Attorney for Defendants

21

22        IT IS SO ORDERED.

23        DATED: 9/14/2015

24

25          
26        United States District Judge